UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: MAR 2 7 1987

SUBJECT: Immediate Removal Request for Summit National Liquid Services, Deerfield Township, Portage County, Ohio (Site Spill ID #04)
ACTION MEMORANDUM

FROM: Loretta E. Kroetsch, On-Scene Coordinator
Emergency Response Section

TO: Valdas V. Adamkus
Regional Administrator

THRU: Basil G. Constantelos, Director
Waste Management Division

PURPOSE

The purpose of this memorandum is to obtain your approval to expend up to [redacted] to eliminate the threat to public health and environment due to the presence of deteriorating conditions at the Summit National Liquid Services site in Deerfield Township, Ohio. The proposed removal action seeks to stabilize the site by restoring the capacity of the waste water ponds on-site, to eliminate the hazard posed by a breached underground storage tank, and to grade the site to ensure appropriate drainage. The project is expected to be completed in 21 working days.

This site is on the National Priorities List with a Hazard Ranking System score of 57.28.

BACKGROUND

Summit National Liquid Services is located in Deerfield Township, Portage County, Ohio. The property encompasses approximately 11 acres of an old strip mining facility. The facility is enclosed within a 6-foot high chain-link fence. To the south there is a cement company, to the east there is a private residence and an open field. On the northwest corner of the site is a scale house and two trailers owned by the Ohio Environmental Protection Agency (OEPA). An incinerator, an underground tank, a metal shed and a dilapidated building are located in the southeast corner of the property. The area around Summit National is lightly populated consisting mostly of farming, light industrial services and several sanitary landfills. Approximately 1 mile to the southeast lies the Berlin Reservoir which is designated as an exceptional warm water habitat by the OEPA and serves as a back-up water supply for the city of Youngstown, Ohio.

In June 1973, [redacted], owner/operator of Summit National, obtained a permit to install an 18,000 gallons per month liquid waste incinerator from the Akron Air Pollution Agency. In 1974, Mr. Georgeoff received

a permit from the OEPA to operate the incinerator and began accepting liquid wastes from manufacturing firms and chemical companies. Wastes were delivered and stored in 55-gallon drums and bulk tanks. In June 1975, the OEPA investigated a complaint of an unauthorized discharge of waste water from the Summit National site. This led to the construction of a french drain which surrounds the perimeter of the site. The old ditch, which was surrounded by the french drain, became the east and west ponds that presently exist. In 1976, the U.S. EPA conducted a Spill Prevention Control and Countermeasures (SPCC) inspection of the site. The inspection revealed violations of not only 40 CFR 112, but also violations of additional Federal and State regulations.

In 1978, as a result of the U.S. EPA investigation, Mr. [redacted] was ordered to clean up the facility and cease receiving wastes. From 1980 through 1982, the U.S. EPA, OEPA, United States Coast Guard (USCG) and responsible parties all helped finance various stages of the surface cleanup. Over 16,000 55-gallon drums and 130,000 gallons of liquid waste from 13 bulk storage tanks were removed. Wastes removed included hexachlorocyclopentadiene (C-56), various pesticides and pesticide wastes, flammable solvents, chlorinated solvents, plating sludges, cyanides, acids and polymers. Limited soil removal was accomplished during the surface cleanup. Underground storage tanks and buried drums were not addressed at that time. However, remedial efforts have focused on subsurface investigations since the conclusion of the surface cleanup.

On May 1, 1986, Mr. Robert W. Bowlus and the Technical Assistance Team (TAT) visited the site and observed a large surface puddle, containing a black tarry substance, approximately 10 feet by 30 feet in dimension. At the north edge of the puddle was a 2-foot diameter manway opening to an underground tank. This tank is buried approximately 25 feet north of the incinerator. The tank appeared to be filled with the black tar material. The tank is suspected to have ruptured and ground water is entering the tank, displacing the tar material. It is rumored that this tank may have been a railroad tanker, in which case the total volume would be close to 20,000 gallons. In the northwest corner of the site, next to one of the trailers, was a metal shed filled with cartons of full sample bottles. These samples were collected by OEPA during surface cleanup efforts. The shed appeared full of these cartons and contained approximately 8,000 32-ounce sample jars. It is expected that OEPA will remove and dispose of these samples shortly.

On December 9, 1986, the REM IV Contractors (SRW Associates) were at Summit National site preparing to initiate the treatment of approximately 5,000 gallons of waste water derived from the Remedial Investigation (RI) activity. A site reconnaissance was conducted to ensure that the water treated with carbon adsorption would not create a discharge off-site, as required by Ohio EPA. During the reconnaissance, it was observed that the east portion of the site was flooded due to the high pool elevation of the east pond. The embankment eroded, thus allowing the water to discharge to the east through residential property and then joining the nature drainage pattern to the east.

At the request of the Remedial Project Manager (RPM), TAT members visited the site to conduct a site assessment. Based on the analytical data and the situation, TAT suggested opening the valves and allowing the water to discharge to the impoundment rather than discharging to private property.

On December 11, 1986, the RPM instructed SRW to direct the overflow into the established southeast drainage pattern. Since the three gate valves normally used to discharge water from the east pond were inoperable, a siphon pipe was installed by SRW. The OEPA was consulted prior to these actions. Due to the emergency situation, OEPA agreed to allow the pond to discharge towards the impoundment to facilitate drainage and increase the freeboard of the pond.

THREAT

Removal action is authorized under Section 300.65 of the National Contingency Plan (NCP) where there is "actual or potential contamination of drinking water supplies or sensitive ecosystems", "hazardous substances or pollutants or contaminants in drums, barrels, tanks or other bulk storage containers that may pose a threat of release" and "weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released".

The two ponds on the site, east and west, were formed by the diversion of drainage to the south of the property. The site was graded so that surface runoff was collected in the ponds. A french drain, installed around the perimeter of the facility as part of the OEPA site stabilization actions, also drains into the east pond. Three inoperative submerged overflow pipes are to discharge the water from the east pond into a drainage ditch which runs along the outside of the eastern boundary of the facility, which in turn flows to the southeast into a containment area. The water from the containment area is suspected to percolate into the ground or through the embankment along the underlying drainage channel.

The greatest threat that is posed by the overflowing water is that the structural integrity of the pond could be breached, resulting in sweeping contaminated sediments downstream. In addition, the inoperative overflow system has allowed flooding to occur in the northeast corner of the site. The analytical results of the surface water indicate very low levels of volatile and semi-volatile constituents. The majority of the inorganics present in the surface water are parameters exempted from discharge standards due to the past history of the area as a coal strip mining facility.

The presence of these ponds on-site also increases the potential for groundwater contamination by creating a hydrostatic head forcing groundwater recharge through contaminated soils and buried drums.

The underground tank that is located near the incinerator is a known leaking point source of contamination to the surrounding land and is suspected to be migrating off-site via the south drainage path.

ENFORCEMENT

Tentatively identified potentially responsible parties (PRP's) will be given notice letters to conduct work specified in this Action Memorandum. The PRP's will have 3 days to state their willingness to conduct the work specified herein and 5 days to deliver a scope of work to the Agency pursuant to a §106 unilateral order. Any deviation from the specified time restrictions will constitute a failure to respond and consequently, the Agency will commence action as specified herein.

PROPOSED PROJECT AND COSTS

In order to protect human health and welfare and the environment, it is necessary that action be taken to control the sources of off-site release and threatened release. The following immediate removal actions are proposed for the site:

1) Reduce the volume in the on-site ponds by dewatering with appropriate treatment, and restore the integrity of pond berms;

2) Alter the site topography as necessary to direct surface runoff to a central collection point to facilitate drainage control;

3) Insure operation of and improve present drainage in the east and south channels;

4) Install embankments around the perimeter of the site as necessary to eliminate off-site run-on of surface water;

5) Recover and dispose of underground tank contents and render the tank incapable of holding or leaching contaminants; remove the tank if necessary;

6) Stabilize the site.

The project is expected to be completed within 21 working days.

The estimated project costs are as follows:

Cleanup contractor	[redacted]
Contingency (20%)	
Subtotal	[redacted]
TAT	$ [redacted]
EPA	
Other Costs (15%)	
Project Total	[redacted]

REGIONAL RECOMMENDATION

Because conditions at the Summit National Liquid Services site meet the NCP §300.65 criteria for an immediate removal, I recommend your approval of this immediate removal request. The estimated total project costs are [redacted], of which [redacted] are for extramural contractor costs. You may indicate your approval or disapproval by signing below.

APPROVE: Robert Springer for DATE: 3/30/87
REGIONAL ADMINISTRATOR

DISAPPROVE: _____ DATE: _____
REGIONAL ADMINISTRATOR

Attachment

3/27/87

ATTACHMENT 1

Detailed Project Estimate

Extramural Costs

- Site administration and security	[redacted]
- Grading and embankments	$[redacted]
- Tank removal and disposal	$[redacted]
- Drainage channels	$ [redacted]
- Water treatment system	$ [redacted]
- Tank liquid disposal	$[redacted]
- Analytical costs	$ [redacted]
- Contingency (20%)	$[redacted]
Sub-Total	[redacted]

Intramural Costs

TAT Costs	$[redacted]
EPA Costs	[redacted]
Other Costs (15%)	[redacted]
Project Ceiling Estimate	[redacted]